

217/782-2113

CONSTRUCTION PERMIT-NSPS SOURCE

PERMITTEE

Press-On Tape & Gasket Corporation
Attn: Steven Atlas
1020 South Westgate Drive
Addison, Illinois 60101

Application No.: 03080039

I.D. No.: 043005AMQ

Applicant's Designation:

Date Received: August 19, 2003

Subject: Catalytic Afterburner

Date Issued: November 4, 2003

Location: 1020 South Westgate Drive, Addison

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of catalytic afterburner with total enclosures for modified line 2 and existing Line 1 as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. Coating Line (Line 2) is subject to New Source Performance Standards (NSPS), 40 CFR 60 Subparts A and RR. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 60.445(d), the Permittee shall maintain a 12 month record of the amount of solvent applied in the coating for Line 2.
2. Emissions and operation of coating Lines 1 and 2 shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
Coatings (With Afterburner)	53,134	318.8	2,657	15.94
Coatings (Without Afterburner)	383	1.9	383	1.90
Clean-Up Solvent	334	2.0	168	1.00

These limits are based on complete volatilization of the VOM content of the materials, 95% overall control efficiency for the afterburner based on compliance testing, VOM usage = VOM content x material usage, the use of shop towels during clean up, and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. The Permittee shall operate Lines 1 and 2 (with afterburner in operation) in compliance with 35 Ill. Adm. Code 218.207(b)(1), which states afterburner shall be operated in manner that maintains 81% overall efficiency and 90% destruction across the afterburner.
4. The Permittee may operate Lines 1 and 2 without the afterburner in operation when applying coatings that are in compliance with 35 Ill. Adm. Code 218.204(c) VOC limit of 2.3 lb/gallon (minus water and other exempted compounds) or less.

- 5a. The afterburner shall be in operation at all times when Lines 1 and 2 are applying coatings that are not in compliance with 35 Ill. Adm. Code 218.204(c).
- b. The afterburner combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than 1400°F. This temperature shall be maintained during operation.
- c. The afterburner shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the afterburner is in use. This device shall monitor the temperature rise across each catalytic afterburner bed or VOM concentration.
- d. The Permittee shall collect and record the following information each day;
 - i. A log of operating time for the capture system, afterburner, monitoring device, and the associated emission unit(s).
 - ii. A maintenance log for the capture system, afterburner, and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- e. All records shall be maintained for three years and be made available to the Illinois EPA for inspection or copying upon request.
- f. Any record showing a violation of the conditions of this permit or 35 Ill. Adm. Code 218.207(b)(1), shall be reported by sending a copy of such record within 30 days following the occurrence of the violation.
6. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
7. The Permittee shall maintain records of the vendor recommendations at the facility and be available for inspection and copying by the Illinois EPA.
8. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
9. The catalytic afterburner may be operated for a period of 180 days under this Construction Permit.
10. Within 90 days of initial startup, the VOM emissions of the catalytic afterburner shall be measured during conditions, which are

representative of maximum emissions.

11. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Illinois EPA: Refer to 40 CFR 60, Appendix A, and 40 CFR 61, Appendix B, for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Volatile Organic Material	USEPA Method 25, 25A if outlet VOM cont. < 50 ppmv as C Non CH ₄

12. At least 30 days prior to the actual date of testing, a written test plan shall be submitted to the Compliance Section of the Division of Air Pollution Control for review. This plan shall describe the specific procedures for testing, including as a minimum:
- The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
 - The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods. The specific sampling, analytical and quality control procedures which will be used, with an identification of the standard methods upon which they are based.
 - Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
 - Any proposed use of an alternative test method, with detailed justification.
 - The format and content of the Source Test Report.
13. The test shall be designed to measure both the destruction efficiency across the afterburner and the overall control efficiency provided by the combination of the capture system and afterburner.
- 14a. Within 90 days of completion of construction of the catalytic afterburner in the above referenced permit application, the organic material concentrations in the effluent stream of the catalytic afterburner shall be measured by an approved testing service. These tests shall be conducted in accordance with 35 Ill. Adm. Code 218.105.

- b. The test procedures shall be designed to verify both 90% destruction of VOM across the afterburner and 85% overall control of VOM by the capture system and afterburner as required by 35 Ill. Adm. Code 218.207(b). Prior to conducting such a test, the Agency shall be consulted to verify that the intended test method is appropriate for use in testing this equipment to show compliance with this rule.
 - c. This test shall be conducted during circumstances which are representative of maximum emissions, and equipment data and material usage during the test shall be recorded.
15. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA within 14 days after the test results are compiled and finalized.
16. Within 30 days after completion of sampling, the Final Report shall include as a minimum:
- a. A summary of results
 - b. General information
 - c. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule
 - d. Detailed description of test conditions, including
 - i. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption
 - ii. Control equipment information, i.e., equipment condition and operating parameters during testing, and
 - iii. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair
 - e. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration
 - f. An explanation of any discrepancies among individual tests or anomalous data
 - g. The results of all quality control evaluation, including a copy of all quality control data.
17. The Permittee shall maintain the following records:
- a. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), the Permittee shall maintain the following each day for each coating applied on Lines 1 and 2 when the afterburner is not in operation:
 - i. The name and identification of each coating as applied; and

- ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied.
 - c. The Permittee shall maintain the following records for Lines 1 and 2 when the afterburner is in operation and all other coaters:
 - i. Name, usage (gallons/month and gallons/year), VOM and HAP content (% weight or lb/gallon), and VOM and HAP emissions for each coating as applied.
 - d. Usage of clean-up solvents (gallon/month and gallon/year); and
 - e. Total VOM and HAP emissions from the facility (lb/month and tons/year).
 - f. For each day of operation of the afterburner the Permittee shall maintain the date and time of operation.
18. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
19. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
20. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue

Maywood, Illinois 60153

21. The volatile organic material concentration in the effluent stream of the afterburner shall be measured by an approved independent testing service, within 45 days of a written request by the Illinois EPA for such a test. The Illinois EPA will require this test if, based on observations by Field personnel, the afterburner is poorly maintained or operated so as to make compliance with 35 Ill. Adm. Code 218.207 uncertain.
22. Emissions and operation of the catalytic afterburner shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Maximum Firing Rate (mmBtu/Hr)</u>	<u>Pollutant</u>	<u>Emission Factor (Lb/mmScf)</u>	<u>Emissions (Lb/Hr) (Ton/Yr)</u>	
Burner (Each)	2.5	NO _x	100	.25	1.07
		CO	84	.21	.90
		TSP	7.6	.02	.08
		VOM	5.5	.01	.04

These limits are based on standard AP-42 emission factors and 8,760 hours of operation. Compliance with annual limits shall be determined from a running total of 12 months of data.

23. Satisfactory completion of these tests so as to demonstrate compliance with applicable emission limits is a prerequisite to issuance of an operating permit, pursuant to 35 Ill. Adm. Code 201.160(a), (b) and (c).

If you have any questions on this, please call Eric Jones at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

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cc: Region 1